

### **REMARKS**

The Official Action mailed September 11, 2006, has been received and its contents carefully noted. This response is filed within three months of the mailing date of the Official Action and therefore is believed to be timely without extension of time. Filed concurrently herewith is a *Request for Continued Examination*. Accordingly, the Applicant respectfully submits that this response is being timely filed.

The Applicant notes with appreciation the consideration of the Information Disclosure Statements filed on February 24, 2004; December 21, 2005; and June 12, 2006.

A Correction to Previously Submitted Information Disclosure Statement is submitted herewith and consideration of this Correction is respectfully requested.

Claims 2-37 were pending in the present application prior to the above amendment. Claims 2-9 and 26-29 have been amended to better recite the features of the present invention, and new dependent claims 38-89 have been added to recite additional protection to which the Applicant is entitled. Accordingly, claims 2-89 are now pending in the present application, of which claims 2-9 are independent. For the reasons set forth in detail below, all claims are believed to be in condition for allowance. Favorable reconsideration is requested.

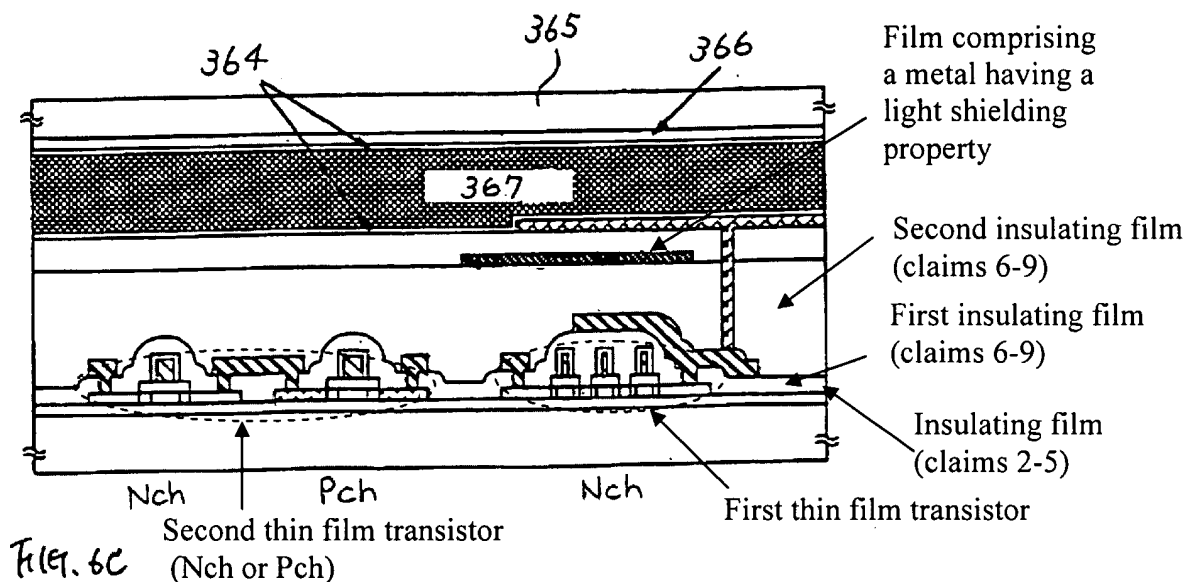
The Official Action rejects claims 2-9 and 30-37 as obvious based on U.S. Patent No. 6,219,113 to Takahara and claims 10-29 as obvious based on the combination of Takahara and U.S. Patent No. 6,115,097 to Yamazaki. The Applicant respectfully submits that a *prima facie* case of obviousness cannot be maintained against the independent claims of the present application, as amended.

As stated in MPEP §§ 2142-2143.01, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the

prior art reference (or references when combined) must teach or suggest all the claim limitations. Obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. "The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art." In re Kotzab, 217 F.3d 1365, 1370, 55 USPQ2d 1313, 1317 (Fed. Cir. 2000). See also In re Fine, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); In re Jones, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).

The prior art, either alone or in combination, does not teach or suggest all the features of the independent claims, as amended. Independent claims 2-9 have been amended to recite structural features such as an insulating film over first and second thin film transistors, a film comprising a metal having a light shielding property, and provided over the insulating film. For example, claim 2 has been amended to recite a semiconductor device comprising: a plurality of pixels over a substrate, each pixel comprising a first thin film transistor; a data line driver circuit over the substrate, comprising a second thin film transistor; an insulating film over the first thin film transistor and the second thin film transistor; a film comprising a metal having a light shielding property, and overlapping the first thin film transistor through the insulating film; a dividing circuit over the substrate, for dividing a signal into n signals, and inputting the n signals to n pixels among the plurality of pixels through outputting the n signals to n video input signal lines, where the n signals are inputted into the n first thin film transistors corresponding to n pixels among the plurality of pixels by a timing signal supplied from the data driver circuit, simultaneously, and where wirings of the data line driver circuit and the dividing circuit comprise the metal. The feature "wherein wirings of the data line driver circuit and the dividing circuit comprise the metal" is supported in the

present specification, for example, by page 13, lines 11-17. Support for the other features noted above may be found in the present specification, for example, in Figures 5A-6C (Figure 6C is reproduced and annotated below).



For the reasons provided below, Takahara and Yamazaki, either alone or in combination, do not teach or suggest the above-referenced features of the present invention.

The Official Action asserts that Takahara teaches or suggests the features of claims 2-9 and 30-37 (pages 2-7, Paper No. 20060902). Also, in the Response to Arguments section, the Official Action asserts that "[t]he claimed invention is drawn to a semiconductor structure" and "[w]hat is patentable is the structure of the semiconductor device not what the structure does" (pages 8-9, *Id.*). In response, the independent claims have been amended as noted in detail above.

Takahara does not teach or suggest the amended features of the present independent claims. Takahara appears to disclose a light shielding film 152 on a TFT in Figures 15, 16, 21, 46 and 89, and a light shielding film 542 over a driver circuit through a liquid crystal layer 21 in Figure 54. However, Takahara does not teach or suggest a

film comprising a metal having a light shielding property, and overlapping a first thin film transistor through an insulating film, where wirings of a data line driver circuit and a dividing circuit comprise a metal.

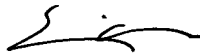
Yamazaki does not cure the deficiencies in Takahara. The Official Action relies on Yamazaki to allegedly teach features of dependent claims 10-29. Specifically, the Official Action relies on Yamazaki to allegedly teach a data line driver circuit comprising a shift register, NAND circuits, a level shifter and a buffer; a substrate comprising glass; and a thin film transistor comprising polycrystalline silicon film (page 8, Paper No. 20060902). However, Takahara and Yamazaki, either alone or in combination, do not teach or suggest a film comprising a metal having a light shielding property, and overlapping a first thin film transistor through an insulating film, where wirings of a data line driver circuit and a dividing circuit comprise a metal.

Since Takahara and Yamazaki do not teach or suggest all the claim limitations, a *prima facie* case of obviousness cannot be maintained. Accordingly, reconsideration and withdrawal of the rejections under 35 U.S.C. § 103(a) are in order and respectfully requested.

New dependent claims 38-89 have been added to recite additional protection to which the Applicant is entitled. Claims 38-40 are similar to claims 26-29. Claims 42-49 are supported in the present specification, for example, by page 12, line 25, through page 13, line 7. Claims 50-57 are supported in the present specification, for example, by page 13, lines 11-16. Claims 58-65 are supported in the present specification, for example, by page 14, lines 5-6, and Figure 5D. Claims 66-73 are supported by page 16, paragraphs 1 and 2. Claims 74-81 are supported in the present specification, for example, by Embodiment 5. Claims 82-89 are supported in the present specification, for example, by page 21, lines 6-11. For the reasons stated above and already of record, the Applicant respectfully submits that new claims 38-89 are in condition for allowance.

Should the Examiner believe that anything further would be desirable to place this application in better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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